

KOSTELANETZ & FINK, LLP

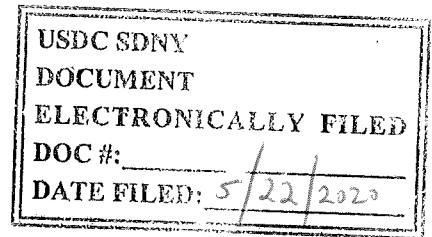
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May 22, 2020

Via ECF

Honorable Vincent L. Briccetti
United States District Judge
Southern District of New York
300 Quarropas Street, Room 630
White Plains, New York 10601

Re: United States of America v. Marin, et al. (SDNY 18-9307)

Dear Judge Briccetti:

We represent Carla Marin and the Estate of Ana Beatriz Marin (collectively the "Estate Defendants") in the above-referenced action. We write to respectfully request an order granting a one-week extension of the current stay, which is scheduled to end today, to Friday May 29, 2020, along with the continued tolling of deadlines during the pendency of the stay. This is the Estate Defendants' first request to extend the current stay.

The Estate Defendants, the United States, and the State of New York are actively working to finalize a settlement agreement, and the Estate Defendants anticipate that a stipulated resolution will likely be filed with the Court early next week. Out of an abundance of caution, given the Government's motion to appoint a receiver, the Estate Defendants' pending deadline to respond, and the upcoming holiday weekend, which may make it difficult for the parties to receive final settlement approvals by Tuesday, the Estate Defendants would respectfully request that the Court extend

APPLICATION GRANTED.

// All deadlines in this case are stayed through 5/29/2020.

// By 6/1/2020, the parties shall file either a proposed stipulation of dismissal or a further update regarding the status of settlement.

// Chambers will mail a copy of this Order to pro se defendant Carl F. Marin at the address on the docket.

// The Clerk is instructed to terminate the letter-motion. (Doc. #155).

// SO ORDERED:

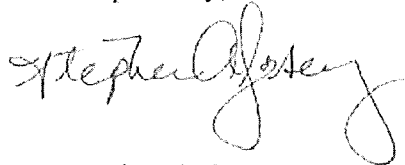
A handwritten signature in black ink, appearing to read "Vincent Briccetti".

Vincent L. Briccetti, U.S.D.J.

May 22, 2020

The Estate Defendants have conferred with counsel for the United States as well as Carl Marin, both of whom consent to the requested relief.

Respectfully,

A handwritten signature in black ink, appearing to read "Stephen A. Josey". The signature is fluid and cursive, with a large, stylized "S" at the beginning and a long, sweeping tail that extends to the right.

Stephen A. Josey
Megan L. Brackney
sjosey@kflaw.com

cc:

Samuel Dolinger (*counsel for the United States*) (via ECF)
Carl Marin (via email)